From: "Lori Navadel" < Inavadel@cox.net>

To: "Wayne Chiu" < wchiu@waterboards.ca.gov>

Date: 7/23/2007 10:29:43 PM

Subject: Re: OSWS for San Diego County

Mr. Chiu:

Thank you for getting back to me. I am familiar with the various regulations (although admittedly extremely confused about the various interpretations of current and future regulations, to include the "Draft OWTS" that should replace the antiquated existing plan). I have been waiting for over two years for new regulations, but unfortunately the wheels of the government are turning very slowly with regards to new regulations. If this is an avenue that could possibly enable me to finally build a house on my property, I want to give it a try...

I would like to submit a formal comment/question for inclusion:

## BEGIN STATEMENT

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I currently have a little over 4 acres in San Diego County (537 Holly Lane, Vista CA 92084). At the present time, I have 2 adjacent parcels (each 2+ acres). One parcel has an existing 4 bedroom house (with a septic system) where my parents reside -- sewer access is not available unless I spent 70-110 thousand dollars to bring it to the property. After having two percolation tests conducted on the adjacent 2+ acre parcel, although a number of areas had rates ranging from 80-120, it still fails under current regulations to qualify for a traditional septic system -- this parcel is where I want to build the home where I would reside as soon as I retire from the US Department of State. Being that it would cost around 70-110 thousand dollars just to bring sewer to my property, this option is something that is not economically feasible (I'm sure there are numerous other individual San Diego county property owners [developers not included for this comment] that are in the same situation..

Advancements in science have lead to the development of alternate systems that, when attached as secondary units/systems to a standard septic system (in lieu of a leach field), have the ability to almost completely eliminate contaminants; thereby providing a save a secure way to use an Alternate OWTS on a parcels that would otherwise not qualify for septic. I believe that the system listed below should be authorized as an approved exception for use in San Diego county for existing parcels (to include new construction by individual owners and the repair of failed systems in areas where both space and poor soil are issues) -- not developers for new residential projects). I would like to formally include the request for my property in Vista be granted an exception for an alternate system in order for me to build my residence. Below is information on the Alternate OWTS I would like approved for use in San Diego county under the Waver program:

Glendon® BioFilter Facts You Should Know

General

The Glendon® BioFilter System is the most effective on site system available on the market today. Its patented process transforms

household sewage into clear, useful water which may be safely percolated into the soil or recycled in accordance with local regulations. BioFilter effluent has been laboratory tested under a variety of operating conditions and meets the specifications for Washington State Treatment Standard Number One, without disinfections. The BioFilter uses no chemicals or disinfectants, ozone, or ultraviolet processes. All of these processes or techniques are recognized as being expensive or maintenance intensive, and some can be harmful to the environment. The Model M3 BioFilter has been approved as a propriety alternative system by the Washington State Department of Health (WSDOH). The next generation BioFilter, the M31 has also been approved by WSDOH.

## Operating Principles

The BioFilter acts as a living organism that breathes air and consumes organic material contained in septic tank effluent while producing essentially pure water and innocuous, odorless gasses which diffuse unnoticed into the air. The harmful organic materials in septic effluent are living and non-living organic matter dissolved and suspended in the sewage water, including sewage indicating bacteria called fecal coliform. The sewage purified by the BioFilter is no longer a threat to health. It is sparkling clear, highly oxygenated, and smells fresh.

## Performance

The BioFilter has the capability to produce effluent with very low levels of sewage characteristics of fecal coliform (FC), biological oxygen demand (BOD), or total suspended solids (TSS). Typical laboratory test results are:

WSDOH Std. #1 Lab Tests at Site #1 #2 FC 100ml 0.0 1.0 BOD <100ppm 4.2 2.3 TSS <100ppm 0.1 0.1

## Reliability

Throughout the years of service by many Glendon® installations operating in a wide variety of conditions, there have been no failures of the BioFilter. The BioFilter has no mechanical parts to wear out or get out of adjustment. It requires no power to accomplish its treatment processes. It needs no regular maintenance. It is normally fed by a small, reliable, 110 volt electric pump for metered flow.

Effluent quality is ensured by extensive anaerobic pretreatment before processing in an unsaturated, continuously purifying capillary flow through an inverted V sand path. This final process provides enhanced aerobic treatment before the purified water wicks into the surface of the native soil at the perified water wicks into the surface of the native soil at the periphery of the BioFilter where it mixes with the natural flow of local ground moisture. The treated effluent can also be collected and stored for recycling if desired. This advanced process is in a class by itself for performance, adaptability, reliability, low maintenance, and

cost-effectiveness.

Glendon® BioFilter Facts You Should Know

Glendon® Biofilters are Clean, Green Biological Machines.

That's the Glendon® difference!

- Guaranteed Clean
- a.. Highest Quality Effluent
- b.. BioFilter® Unit-Guaranteed for 2 yrs
- c.. Intrusion Proof Control Panel
- 2.. Guaranteed Green
- a.. No Chemical or UV Disinfectants
- b.. Low Maintenance
- c.. Low Power Consumption
- d.. Flexible Footprint
- 3.. Unsurpassed for tough sites
- a.. Great for High Water Table or Shallow Soil
- b.. Quality of effluent makes Glendon® the best system

for Wetlands, Shorelines or Protected areas

Semper Fidelis,

George M Navadel 537 Holly Lane Vista, CA 92084

END STATEMENT

Thank you for your time and assistance and please let me know if/when any action and/or decision is made on my request.

Semper Fidelis -- George